

**WEIL, GOTSHAL & MANGES LLP**

Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
New York, NY 10153-0119  
Tel: (212) 310-8000  
Fax: (212) 310-8007

**KELLER & BENVENUTTI LLP**

Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: (415) 496-6723  
Fax: (415) 636-9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**SECOND STIPULATION BETWEEN  
DEBTORS AND UNITED STATES OF  
AMERICA EXTENDING TIME TO  
RESPOND TO LEASE ASSUMPTION  
MOTION**

Re: Dkt. No. 3726

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the United States of  
4 America (the “**United States**”), on the other hand. The Debtors and the United States are  
5 referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as  
6 a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On August 27, 2019, the Debtors filed the *Fifth Omnibus Motion of the Debtors*  
9 *Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order*  
10 *Approving Assumption of Certain Real Property Leases* [Dkt. No. 3726] (the “**Lease**  
11 **Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on September 24,  
12 2019. Any response or opposition to the Lease Assumption Motion was due by 4:00 p.m.  
13 (Pacific Time) on September 10, 2019.

14 B. On September 6, 2019, the Parties entered into the *Stipulation Between Debtors*  
15 *and United States of America Extending Time to Respond to Lease Assumption Motion* (“**First**  
16 **Stipulation**”) [Dkt. No. 3830], which extended the time for the United States to respond to the  
17 Lease Assumption Motion to 4:00 p.m. (Pacific Time) on September 13, 2019. The Court  
18 entered an order granting the First Stipulation on September 6, 2019 [Dkt. No. 3835].

19 C. Counsel for the United States has requested, and counsel for the Debtors has  
20 agreed, that the time for the United States to respond to the Lease Assumption Motion be further  
21 extended.

22 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
23 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
24 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
25 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
26 **THAT:**

27 1. The time for the United States to file and serve any response or opposition to the  
28 Lease Assumption Motion is extended through 12:00 p.m. (Pacific Time) on September 18, 2019.

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Dated: September 12, 2019  
KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp  
Thomas B. Rupp

*Attorneys for Debtors  
and Debtors in Possession*

Dated: September 12, 2019  
UNITED STATES DEPARTMENT OF  
JUSTICE, CIVIL DIVISION

/s/ Matthew J. Troy  
Matthew J. Troy

*Attorneys for United States*